

ADMITTED IN VIRGINIA, MARYLAND,
DISTRICT OF COLUMBIA AND NEW YORK

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October 22, 2018

BY E-MAIL AND MAIL

Christopher B. Greene, Esq.
Kaplan & Company, LLP
350 Fifth Avenue
Suite 7110
New York, New York 10118

Re: *Sines, et al. vs. Kessler, et al.*

Dear Mr. Greene:

I write to follow up on my letter, dated August 10, 2018, concerning Plaintiff's Responses and Objections to Defendant Richard Spencer's First Request for Production of Documents (hereinafter "Responses"), which Responses were served by e-mail on July 23, 2018.

As of this writing, I have not received any reply from you with respect to the deficiencies I noted in the letter.

Nor have I received any supplemental response informing me whether responsive documents or things exist¹; and I have not received any actual production of documents or things in response to the Request.

Please advise me of your clients' intention in this matter.

Thank you.

Very truly yours,

John A. DiNucci

¹ Most, if not all, of the individual Responses state that responsive documents "if any" will be produced. None says that responsive documents exist or do not exist.



Christopher B. Greene, Esq.
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cc: Mr. Spencer (by e-mail only)
David L. Campbell, Esq. (by e-mail only)
Bryan Jones, Esq. (by e-mail only)
James E. Kolenich, Esq. (by e-mail only)
Elmer Woodard, Esq. (by e-mail only)